

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

JONATHAN TROTTA and MELISSA
TROTTA,

Plaintiffs,

v.

ARMELLINI EXPRESS LINES,
INC., MABRAND CARRIERS
GROUP, INC. ORLANDO DELGADO,
AND JOHN DOES 1-X,
(fictitiously Named
Defendants),

Defendants.

SUPERIOR COURT OF NEW JERSEY
ESSEX COUNTY
DOCKET NO: ESX-L-996-17

CIVIL ACTION

NOTICE OF REMOVAL

TO: Civil Clerk
Essex County Superior Court
465 Dr. Martin Luther King, Jr. Blvd.
Newark, NJ 07102

Justin M. Cohen, Esq.
Law Offices of Adam M. Kotlar, LLC
1913 Greentree Road
Cherry Hill, NJ 08003

William T. Connell, Esq.
Dwyer Connell & Lisbona
100 Passaic Avenue
Fairfield, NJ 07004

SIR/MADAM:

PLEASE TAKE NOTICE that annexed hereto is a true copy of the
Petition for Removal which was filed in this action in the United
States District Court for the District New Jersey pursuant to 28
U.S.C. § 1441 and 1446 on January 30, 2018.

PLEASE TAKE FURTHER NOTICE, that said filing, together with the filing and service of this Notice, has effected the removal of this action to the United States District Court for the District of New Jersey pursuant to 28 U.S.C. §1446, and no further proceedings with respect to this action can take place in this Court.

Attached hereto as **Exhibit A** is a true and correct copy of all pleadings and process filed in this action in the Superior Court of Essex County, Newark, New Jersey, under Docket No. ESX-L-996-17. This Notice of Removal is being concurrently filed with the United States District Court of the District of New Jersey. A copy of this application in its entirety is being forwarded to Justin M. Cohen, Esq., Law Offices of Adam M. Kotlar, LLC., 1913 Greentree Road, Cherry Hill, New Jersey 08003, attorney for the Plaintiffs Jonathan Trotta and Melissa Trotta and William T. Connell, Esq., Dwyer Connell & Lisbona, 100 Passaic Avenue, Fairfield, New Jersey 07004, attorney for Armellini Express Lines, Inc.

COTTRELL SOLENSKY, P.A.

Attorneys for Defendants, Mabrand Carriers Group, Inc.

By:


Floyd G. Cottrell, Esq.

Dated: January 30, 2018